IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS BOSTON DIVISION

ELEANOR McCULLEN, JEAN)
BLACKBURN ZARRELLA,)
GREGORY A. SMITH, CARMEL)
FARRELL, and ERIC CADIN,	
,	Civil Action No
Plaintiffs,)
)
v.)
)
MARTHA COAKLEY, Attorney)
General for the COMMONWEALTH OF)
MASSACHUSETTS,)
)
Defendant.)

MOTION TO ADMIT MICHAEL J. DEPRIMO PRO HAC VICE

Philip D. Moran, a member in good standing of the Bar of this Court, hereby moves for the admission of Michael J. DePrimo to participate in the conduct of the trial of this action and related pre-trial and post-trial proceedings on behalf of Plaintiffs. In support of this motion, Mr. DePrimo states as follows:

- 1. I am a licensed attorney with eleven (11) years experience in federal civil rights and First Amendment litigation. My business address is 778 Choate Avenue; Hamden, Connecticut 06518. My telephone number is (203) 281-1496. My email address is michaeldeprimo@gmail.com.
- 2. I am an active member in good standing of the State Bars of Connecticut (Bar # 402211), Mississippi (Bar # 10813), and Virginia (Bar # 30326). I am admitted to practice, and in good standing, in the United States District Courts for the District of Connecticut, District of Colorado, Central District of Illinois, Eastern District of Michigan, Northern and Southern

Districts of Mississippi, Northern District of Texas, Eastern District of Virginia, and Eastern and Western Districts of Wisconsin, as well as the United States Courts of Appeal for the First, Second, Third, Fourth, Fifth, Ninth, Tenth, Eleventh, and District of Columbia Circuits, and the United State Supreme Court.

- 3. I have never been subject to professional disciplinary proceedings, or criminal charges, of any kind and my name does not appear on any list of attorneys disqualified to appear in the aforementioned courts or any other courts of record. There are no disciplinary proceedings currently pending against me.
- 4. I will familiarize myself with and comply with the standards of professional conduct required of members of the Massachusetts State Bar and the local rules of this Court.
- 5. Attached hereto is a true and correct copy of a Certificate of Good Standing from the United States District Court for the District of Connecticut dated December 27, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

/s/Michael J. DePrimo Michael J. DePrimo

WHEREFORE, movant hereby moves the court to admit Michael J. DePrimo *pro hac vice* to appear on behalf of Plaintiffs in this action.

CERTIFICATION OF COMPLIANCE

Pursuant to Local Rule 7.1(a)(2), the undersigned hereby certifies that on Monday,

December 31, 2007, counsel for Plaintiffs conferred with Kenneth W. Salinger, Esq.,

Administrative Law Division, Office of the Attorney General, Commonwealth of Massachusetts,

who stated that the Commonwealth does not oppose this motion.

Respectfully submitted,

/s/ Philip D. Moran Philip D. Moran, MA Bar # 353920 Philip D. Moran P.C.

265 Essex Street, Suite 202 Salem, MA 01970

Tel: (978) 745-6085 Fax: (978) 741-2572

Email: philipmoranesq@aol.com